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FAX TRANSMITTAL

FAA-04-19411-14

City of Chicago

Richard M. Daley, Mayor

Department of Aviation

John A. Roberson, Commissioner

<http://www.ci.chi.il.us>



To: Marion Blakey
City Document Management System Fax No.: 202-493-2251
Subject: Response of the City of Chicago Date: 11/1/04

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Pages Sent: 4

Here is the response from the City of Chicago in
Response to Unscheduled Operations Reservation
System for O'Hare.

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City of Chicago
Richard M. Daley, Mayor

Department of Aviation

John A. Roberson
Commissioner

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November 1, 2004

Ms. Marion C. Blakey
Federal Administration Administrator
c/o: Docket Management System
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building
Room PL-401
Washington, DC 20590-001

Re: Docket No. FAA-2004-19411
Response of the City of Chicago

Dear Ms. Blakey:

The City of Chicago Department of Aviation wishes to submit for the public record our comments related to the Federal Aviation Administration's proposed reservation system for unscheduled operations at O'Hare International Airport.

The City of Chicago recognizes that it is in the best interest of the national aviation system to mitigate delays at O'Hare. The voluntary agreement that was formed in August is an example of the FAA's commitment to reduce delays and improve on-time performance at the nation's busiest airport.

During the development of the voluntary agreement, the FAA had shown a willingness to work with the airlines and City to provide flexibility in the implementation of the reduced flight plan. The targeted arrival rate of 86 was adjusted to a flexible number that provided more capacity, especially during the peak times of the evening when demand is at its greatest. This flexibility also provided a mechanism to meet the needs of the limited incumbent airlines. The City would like to continue to work in collaboration with the FAA and the unscheduled aircraft operators to provide the flexibility that best maximizes the capacity for unscheduled operations at O'Hare. Followings are areas in which the City believes there is room for flexibility.

- The City asks that the starting time for the reservation program be 8:00 a.m., Central Time. Since a large part of the unscheduled operations are business jets taking executives to meetings, a later start time will prove more



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useful. Passengers arriving on business jets may have difficulty scheduling a meeting in advance based on the fact that they will not know what time the jet will be given a landing reservation until 72 hours prior to a proposed meeting. By moving the start time to 8:00 a.m., executives can schedule in advance a morning meeting at a reasonable time (8:30 or 9:00 a.m.), and not be in doubt about their ability to make it to their meeting. Due to the time zone difference this would be extremely helpful to traffic from the East Coast. Additionally, arrival traffic tends to be lower in the 7:00 - 7:59 a.m., timeframe when compared to the rest of the day.

- O'Hare's good weather capacity is significantly above the 92 scheduled and unscheduled arrivals allowed under the voluntary agreement. The City asks that the FAA make available this excess good weather capacity sooner than the eight hours that is currently proposed. The City would recommend that the FAA use aviation low-level weather prognosis chart forecasts or other aviation weather forecasts to determine 72 hours in advance if excess good weather will be available. If so, more reservations could be made at that time. Alternately, the FAA could use the O'Hare terminal area forecast ("TAF") to determine excess capacity 24 hours in advance.
- The City asks that the FAA be flexible in the unscheduled arrival rate when unique local events are taking place in the Chicagoland area. The City will work with the FAA to identify when certain events are taking place that would cause a rise in unscheduled demand (i.e., conventions, concerts, sporting events).
- O'Hare handles very few military and public use aircraft flights. The City would like to see military and public use aircraft exempt from the reservation program due to the critical nature of their schedules (i.e. the Department of Justice's weekly flights).
- The City requests that the FAA continue to give the highest priority to the decision making process and modeling that are necessary to bring online procedural changes and new technologies that will increase the efficiency of O'Hare.

The only long-term solution to the delay issues at O'Hare is the implementation of the O'Hare Modernization Program (OMP). As



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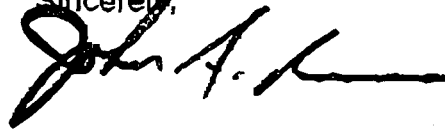


both you and Secretary Norman Mineta have previously stated, the real solution to the delay problem is to increase capacity by adding new infrastructure. We again encourage the FAA to expedite the issuance of the Record of Decision so we can break ground immediately on the OMP and realize its benefits of additional capacity and reduction in delays.

The City welcomes the opportunity to build upon the partnership with the FAA and the DOT to help develop a delay mitigation plan that is fair, balanced, temporary and equitable. We feel encouraged by the progress that has been made so far and look forward to collaboratively working together in the future.

Thank you for your efforts and leadership. I am confident that we will achieve a solution that will prove to be beneficial to the national aviation system.

Sincerely,



John A. Roberson
Commissioner

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